

# HANNOCH WEISMAN

A PROFESSIONAL CORPORATION  
COUNSELLORS AT LAW

(MERGED WITH STERNS, HERBERT, WEINROTH & PETRINO)

A PROFESSIONAL CORPORATION

186 WEST STATE STREET  
P.O. BOX 1298  
TRENTON, NJ 08607-1211  
(609) 392-2100  
TELECOPIER (609) 392-7956

90 NASSAU STREET  
P.O. BOX 1248  
PRINCETON, NJ 08542-1248  
(609) 924-2108  
TELECOPIER (609) 683-7735

4 BECKER FARM ROAD  
ROSELAND, NEW JERSEY 07068-3788

(201) 535-5300

TELECOPIER  
(201) 994-7198  
N. Y. TELEPHONE  
(212) 732-3262

PLEASE REPLY TO:  
P.O. BOX 1040  
NEWARK, NJ 07101-9819

SUITE 600  
1150 SEVENTEENTH STREET, N.W.  
WASHINGTON, D.C. 20036  
(202) 296-3432

OF COUNSEL  
RICHARD J. HUGHES  
JOSEPH A. WEISMAN

WRITER'S DIRECT LINE:

535-5493

FILE #

11192-725E

11192-733E

11192-719E

January 23, 1990

145832



Ms. Janet Feldstein  
United States Environmental Protection Agency ("USEPA")  
Region II  
26 Federal Plaza  
New York, New York 10278

**Re: Amendment of Responses to USEPA Requests for Information Under 42 U.S.C. §9604(e) and 42 U.S.C. §6927 for Scientific Chemical Processing, Inc., 411 Wilson Avenue, Newark, New Jersey and 216 Paterson Plank Road, Carlstadt, New Jersey; and Lone Pine Landfill, Freehold Township, New Jersey**

Dear Ms. Feldstein:

GAF Corporation ("GAF") previously filed responses to USEPA requests for information dated May 18, 1984, February 12, 1985 and June 18, 1985 regarding the referenced sites.

GAF has recently completed a comprehensive review of all materials it has been able to compile relating to its waste shipments to Scientific Chemical Processing, Inc. ("SCP"). The following information reflects the results of that review, and is provided to you as a supplement and amendment to the responses previously provided by GAF to USEPA's requests for information.

The enclosed materials include:

- (1) A memorandum listing waste shipment totals by plant and year and an overall total for GAF shipments to SCP;

GAF SHIPMENTS TO SCIENTIFIC CHEMICAL PROCESSING, INC.

(Shipments are in gallons)

	Linden	Wayne	Johnson City/ Binghamton	Rensselaer	Total
1974	13,795	----	----	----	13,795
1975	632,946	9,575	8,580	----	651,101
1976	341,140	12,870	4,400	----	358,410
1977	164,550	12,350	105,170	----	282,070
1978	146,945	15,155	104,450	8,800	275,350
1979	54,591	----	----	----	54,591
Total	1,353,967	49,950	222,600	8,800	1,635,317

EXPLANATION OF INACCURACIES IN  
EXHIBIT A OF RESPONSE TO MAY 18, 1984  
REQUEST FOR INFORMATION RE: LONE PINE LANDFILL

11192-719E  
11192-725E  
11192-733E

Exhibit A of GAF Corporation's ("GAF") response to USEPA's Request for Information under 42 U.S.C. §9604(e) and 42 U.S.C. §6927 for the Lone Pine Landfill Site contains several inaccuracies in its calculations of total waste shipments to Scientific Chemical Processing, Inc. ("SCP"). GAF has determined that numerous errors were made in calculating the gallonage in the documents referenced in Exhibit A. Those errors include:

(1) Multiple Shipments On One Invoice. Where multiple shipments were covered by one invoice, the full gallonage shown on the invoice is added to the total each time a bill of lading and/or shipping order for one shipment on the invoice was recorded. This error resulted from ignorance of the accounting practice in which an invoice for multiple shipments would be photocopied as many times as necessary to cover each bill of lading and shipping ticket. (See entries in Exhibit A for invoice 9-86, where each bill of lading entry lists the total gallonage shown on the invoice, for an example of this error);

(2) Cyclohexane Recovery. The entries on an invoice for this process are a pick up charge for the drums, a charge for the amount of cyclohexane recovered and sold back to GAF, and a charge for the remaining bottoms. Exhibit A included each of these items in the waste calculations. Only the last entry should be listed as waste. (See entry in Exhibit A for invoice 11-62 for an example of this error); and

(3) Spent Caustic. In 1977, GAF sold SCP spent caustic. SCP resold it to other customers. Therefore, there are no invoices for these transactions, only shipping records. Exhibit A includes all the spent caustic as waste. (See the eight 1977 entries with no invoice entries for examples of this error).

These are only examples of the types and significance of the errors in Exhibit A, but are sufficient to demonstrate the unreliability of the calculations contained in that Exhibit.

# HANNOCH WEISMAN

A PROFESSIONAL CORPORATION

Ms. Janet Feldstein

January 23, 1990

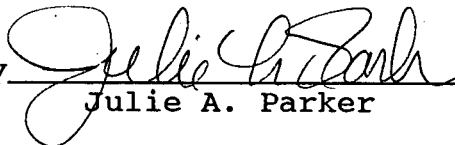
Page 2

- (2) Copies of all plant records relating to waste shipments to SCP, sorted by plant and year. (All documents previously provided to GAF by USEPA for these sites have been cross-checked with these documents);
- (3) A statement generally explaining the inaccuracies that have been identified in Exhibit A of GAF's original response to the May 18, 1984 request for information regarding the Lone Pine Landfill.

If you have any questions after you have had the opportunity to review these materials, please call me.

Very truly yours,

HANNOCH WEISMAN

By   
Julie A. Parker

JAP/jfm